

# **EXHIBIT B**

Morgan, Lewis & Bockius LLP  
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**Morgan Lewis**  
C O U N S E L O R S   A T   L A W

**Sarah Pontoski**  
215.963.5059  
spontoski@morganlewis.com

November 28, 2007

**VIA FACSIMILE AND FIRST CLASS MAIL**

Fran L. Rudich, Esquire  
LOCKS LAW FIRM  
110 East 55th Street, 12th Floor  
New York, New York 10022

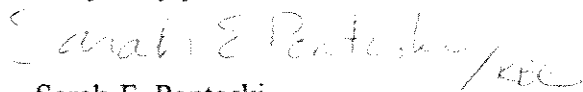
Re: *Carmelo Millan, Individually and on Behalf of all other persons similarly situated v. Citigroup Inc. and Citigroup Technology, Inc.;*  
U.S. District Court, Southern District of New York - No. 07-3769

Dear Ms. Rudich:

I enclose notification from the Court that the status conference in the above-referenced matter scheduled for this Friday, November 30, 2007 has been adjourned. A status conference has been scheduled for January 4, 2008 at 9:30 a.m.

In light of the January conference, we request that you promptly provide us with alternate deposition dates in December on which Plaintiff's deposition can be taken. Additionally, to date, Plaintiff has failed to provide us with Plaintiff's responses to Defendants' written discovery requests, which were originally due November 15, 2007. Plaintiff has failed to provide responses to Defendants' written discovery requests despite your November 16, 2007 assurances, via electronic mail, that we would receive the responses by November 21, 2007. Yet another week has passed with no discovery responses received. In the event that we do not receive Plaintiff's discovery responses in the next week, by December 5, 2007, and with sufficient time to review such discovery responses prior to Plaintiff's deposition, we will take appropriate action with the Court.

Very truly yours,



Sarah E. Pontoski

SEP/tmm

Enclosure

cc: Jeffrey M. Gottlieb, Esquire (w/encl.via facsimile)

**ALVIN K. HELLERSTEIN  
UNITED STATES DISTRICT JUDGE  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
500 PEARL STREET  
NEW YORK, NY 10007-1581  
(212) 805-0152**

**TO: PLEASE SEE ATTACHED FAX COVER**

**FROM: Brigitte Jones, Courtroom Deputy      Date: 11/28/07  
by Order of Judge Alvin K. Hellerstein**

**RE: Case : Carmelo Millan v. Citigroup - 07 civ. 3769 (AKH)  
The status conf. previously scheduled for November 30, 2007 is adjourned.**

**You are hereby notified that you are required to appear for a status conf..**

**Date: 1/4/08  
Time: 9:30 a.m.  
Place: U.S. Courthouse - Southern District of New York  
500 Pearl Street  
Courtroom 14D  
New York, New York 10007**

**It is ORDERED that counsel to whom this Order is sent is  
responsible for faxing a copy to all counsel involved in this case and retaining  
verification of such in the case file. Do not fax such verification to Chambers.**

**NOTE:**

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November 16, 2007

**BY FACSIMILE AND REGULAR MAIL**

Fran L. Rudich, Esquire  
Locks Law Firm  
110 East 55th Street, 12th Floor  
New York, NY 10022

Re: Carmelo Millan, Individually and on Behalf of all other persons similarly situated v.  
Citigroup, Inc., C.A. No. 07CV3769

Dear Ms. Rudich:

I write regarding Plaintiff's deposition and written discovery responses. On November 14, 2007, we wrote and asked you to please provide us with alternative deposition dates for Plaintiff's deposition and Plaintiff's responses to Defendants' written discovery by the close of business on November 15, 2007. To date, you have not provided us with alternative deposition dates or responses to Defendants' written discovery. If we do not receive alternative dates for Plaintiff's deposition and responses to Defendants' written discovery by the close of business on November 19, 2007, we will have no choice but to file a motion to compel.

Very truly yours,

A handwritten signature in black ink, appearing to read "Sarah E. Pontoski", with a long, sweeping horizontal line extending to the right.

Sarah E. Pontoski

SEP/jk

cc: Jeffrey M. Gottlieb (via Facsimile only)

FILE COPY

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C O U N S E L O R S   A T   L A W

**Sarah E. Pontoski**  
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spontoski@morganlewis.com

November 5, 2007

**BY FACSIMILE AND REGULAR MAIL**

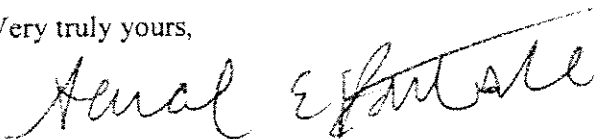
Fran L. Rudich, Esquire  
Locks Law Firm  
110 East 55th Street, 12th Floor  
New York, NY 10022

Re: Carmelo Millan, Individually and on Behalf of all other persons similarly situated v.  
Citigroup, Inc., C.A. No. 07CV3769

Dear Ms. Rudich:

I write regarding Plaintiff's deposition that is currently scheduled for November 19, 2007 at 9:30 a.m. Please confirm that Mr. Millan will appear for his deposition on November 19, 2007. If Mr. Millan is not available on November 19, 2007, please contact us so that we may schedule Mr. Millan's deposition on a mutually convenient date prior to the November 30, 2007 discovery deadline.

Very truly yours,



Sarah E. Pontoski

SEP/jk

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November 14, 2007

**BY FACSIMILE AND REGULAR MAIL**

Fran L. Rudich, Esquire  
Locks Law Firm  
110 East 55th Street, 12th Floor  
New York, NY 10022

Re: Carmelo Millan, Individually and on Behalf of all other persons similarly situated v.  
Citigroup, Inc., C.A. No. 07CV3769

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Dear Ms. Rudich:

I write regarding Plaintiff's deposition and written discovery responses. On October 11, 2007, we noticed Plaintiff's deposition for November 19, 2007. At that time, we asked you to please contact us if he was not available on November 19, 2007, so that the parties could schedule Plaintiff's deposition on a mutually agreeable date. We received no response from you. As a result, on November 5, 2007, we again contacted your office and asked you to confirm that he would appear for his deposition on November 19, 2007. Once again, we asked you to please contact us if he was not available so that the parties could schedule Plaintiff's deposition on a mutually agreeable date.

As of November 13, 2007, we had not received a response to our November 5, 2007 letter. As a result, we again contacted you and asked you to confirm that he would appear for his deposition on November 19, 2007. Finally, more than a month after receiving Defendants' Notice of Deposition, you indicated that Plaintiff was not available on November 19, 2007. Your office, however, did not provide us with an alternative date for his deposition.

As you know, the Court has ordered the parties to complete all fact discovery in connection with Plaintiff's specific claims prior to the November 30, 2007 Court conference. Thus, we must take Plaintiff's deposition prior to that date. Please provide us with at least two alternative dates prior to November 30, 2007 when Plaintiff is available to appear for his deposition by the close of business on November 15, 2007. We are currently available to take Plaintiff's deposition on November 21, 2007 and November 29, 2007.

Fran L. Rudich, Esquire  
November 14, 2007  
Page 2

In addition, Plaintiff's responses to Defendants' interrogatories and requests for production were due on November 13, 2007. To date, we have not received responses from Plaintiff. Please forward responses to us by the close of business on November 15, 2007.

We look forward to hearing from you regarding proposed dates for Plaintiff's deposition and to receiving Plaintiff's discovery responses.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Sarah E. Pontoski", followed by a long horizontal flourish.

Sarah E. Pontoski

SEP/jk

cc: Jeffrey M. Gottlieb (via Facsimile only)